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REMARKS

In response to the Office Action mailed November 2, 2004, Applicants respectfully request reconsideration. To further the prosecution of this Application, Applicants submit the following remarks. Applicant prays that, after consideration of these remarks, a favorable decision will be provided regarding the claims. The claims as now presented are believed to be in allowable condition.

Claims 1-3 and 5-10 are pending in this Application. Claim 1 is an independent claim.

Rejections under §102 and §103

Claims 1-6 were rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,778,503 to Sproat et al. (hereinafter Sproat). Sproat discloses, at column 7, line 54 – column 8, line 7, an apparatus including a trunk interface for receiving incoming low level trunks (e.g. E1 or T1). The trunk interface provides the T1 or E1 data to a TDM framer/cellifier which outputs TDM cells. The TDM cells are provided through an ATM switch to a monitoring processor where the TDM cells are monitored.

In contrast to Sproat, claim 1 recites in part:

“providing a first module having a first physical telecommunications interface and running a first telecommunications protocol;

providing a second module having a second physical telecommunications interface, said second physical telecommunications interface being different from said first physical telecommunications interface, said second module running said first telecommunications protocol; and

sharing a resource from said second module with said first module.”

The Examiner stated that Sproat discloses the first module and first protocol as the TDM framer/cellifier running a T1 protocol. The Examiner also

stated that Sproat discloses a second module (a monitoring processor module) having a second interface different from the first interface and running the first protocol. Applicants respectfully disagree. The second module of Sproat is the monitoring processor module which is believed to include a TDM interface in order to receive the TDM packets from the TDM framer/cellifier by way of the ATM switch. TDM is a type of multiplexing that combines data streams by assigning each stream a different timeslot in a set of timeslots. The monitoring processor is thus running a TDM protocol and NOT the same protocol as the first module which is running a T1 protocol. Sproat therefore fails to disclose or suggest two modules having different telecommunications interfaces running the same protocol, as recited by claim 1. Thus, in claim 1 of the present application a first interface runs a first protocol (e.g. a T1 interface running a T1 protocol), a second interface which is different than the first interface (e.g. an E1 interface) is also running the first protocol (thus the E1 interface is running the T1 protocol). If the rejection of claim 1 is to be maintained, Applicants respectfully request that it be pointed out with particularity where the cited prior art teaches such an arrangement wherein two modules having different telecommunications interfaces are running the same telecommunications protocol. Claim 4 was cancelled in a prior response. Claims 2-3 and 5-6 depend from claim 1 and are believed allowable as they depend from a base claim which is believed allowable. Accordingly, the rejection of claims 1-6 under 35 U.S.C. §102(e) is believed to have been overcome.

Claims 7-8 were rejected under 35 U.S.C. §103(a) as being unpatentable over Sproat in view of U.S. Patent No. 6,343,086 to Katz et al. (hereinafter Katz). Claims 7 and 8 depend from claim 1 and are believed allowable as they depend from a base claim which is believed allowable. Additionally, it should be understood that the dependent claims recite additional features which further patentably distinguish over the cited prior art. Claim 7 recites that the interface channels are made to appear contiguous across the first interface and across the

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second interface. As described in the specification as filed, on page 6, lines 5-10, the channels are configured by software such that they appear to be a single set of contiguous T1 or E1 channels when in fact the hardware resources are not contiguous. This feature is not taught or suggested by the cited prior art. The Examiner stated that Katz teaches this for the purpose of easily connecting both cards together. Applicants respectfully disagree with the Examiner's statement. Applicants point out that claim 7 recites that the interface channels are made to **appear** contiguous, not that they interface channels are physically contiguous as it seems the Examiner is interpreting the language of the claim to read. Accordingly, the rejection of claims 7 and 8 under 35 U.S.C. §103(a) as being unpatentable over Sproat in view of Katz is believed to have been overcome.

Claims 9-10 were rejected under 35 U.S.C. §103(a) as being unpatentable over Sproat in view of Katz and further in view of U.S. Patent No. 6,662,211 to Weller et al. (hereinafter Weller). Claims 9 and 10 depend from claim 1 and are believed allowable as they depend from a base claim which is allowable. Accordingly, the rejection of claims 9 and 10 under 35 U.S.C. §103(a) as being unpatentable over Sproat in view of Katz and further in view of Weller is believed to have been overcome.

The prior art made of record is not believed to disclose or suggest the present invention.

Conclusion

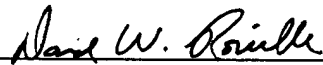
In view of the foregoing remarks, this Application should be in condition for allowance. A Notice to this affect is respectfully requested. If the Examiner believes, after this Response, that the Application is not in condition for allowance, the Examiner is respectfully requested to call the Applicants' Representative at the number below.

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Applicants hereby petition for any extension of time which is required to maintain the pendency of this case. If there is a fee occasioned by this response, including an extension fee, that is not covered by an enclosed check, please charge any deficiency to Deposit Account No. 50-0901.

If the enclosed papers or fees are considered incomplete, the Patent Office is respectfully requested to contact the undersigned collect at (508) 366-9600, in Westborough, Massachusetts.

Respectfully submitted,



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